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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,  
12 Plaintiff,  
13 v.  
14 RAMON AVENDANO-SOTO, and  
JORGE ALFREDO SOTO  
15 Defendant.  
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Case No. 2:20-CR-003-APG-EJY

**STIPULATION TO CONTINUE  
EVIDENTIARY HEARING**  
(Second Request)

17 IT IS HEREBY STIPULATED AND AGREED, by and between Nicholas A.  
18 Trutanich, United States Attorney, and Kevin Schiff, Assistant United States Attorney, counsel  
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 Raquel Lazo, Assistant Federal Public Defender, counsel for Ramon Avendano-Soto, and  
21 Christopher Oram, counsel for Jorge Alfredo Soto, that the Evidentiary Hearing currently  
22 scheduled on November 18, 2020 at 9:00 am, be vacated and continued to a date and time  
23 convenient to the Court, but no sooner than thirty (30) days.

24 This Stipulation is entered into for the following reasons:  
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1           1.       On June 4, 2020 and June 23, 2020, both defendants filed motions to suppress.  
2 ECF No. 27, 37, and 38. The suppression hearing is currently scheduled for November 18,  
3 2020. ECF No. 63.

4           2.       Avendano additionally filed a motion to compel. ECF No. 48. On October 2,  
5 2020, this Court entered an order requiring the government to deliver materials pertaining to  
6 the CI for an in-camera inspection by October 15, 2020. ECF No. 64. The parties stipulated to  
7 a 30-day continuance for the delivery of the materials as well as other outstanding discovery  
8 requested by the defense. ECF No. 65. This Court extended the deadline to November 12, 2020.  
9 ECF No. 66.

10          3.       This deadline is only two days before the currently scheduled evidentiary  
11 hearing date. An extension of time will permit this Court to review the in-camera documents  
12 with sufficient time and determine whether any of the documents will be disclosed to the  
13 defense in advance of the evidentiary hearing. The additional time will also permit the defense  
14 to review any in-camera documents that this Court may order be disclosed to the defense. It  
15 will also provide defense counsel time to review the requested supplemental discovery (the CI's  
16 phone). These items are pertinent to the pending motion and may impact the litigation  
17 surrounding the motion.

18          4.       Defendants are not incarcerated and do not object to a continuance.

19          5.       Additionally, denial of this request for continuance could result in a miscarriage  
20 of justice.

21               This is the second request for continuance filed herein.  
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1 DATED this 21<sup>st</sup> day of October, 2020.

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3 RENE L. VALLADARES  
Federal Public Defender

NICHOLAS A. TRUTANICH  
Acting United States Attorney

4  
5 */s/ Raquel Lazo*  
6 By \_\_\_\_\_

7 RAQUEL LAZO  
Assistant Federal Public Defender

*/s/ Kevin Schiff*  
By \_\_\_\_\_

8 KEVIN SCHIFF  
Assistant United States Attorney

9 */s/ Christopher Oram*  
10 By \_\_\_\_\_

11 CHRISTOPHER ORAM  
Counsel for Jorge Alfredo Soto

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,  
4 Plaintiff,

5 v.

6 RAMON AVENDANO-SOTO, and  
7 JORGE ALFREDO SOTO  
8 Defendant.

Case No. 2:20-CR-003-APG-EJY

**ORDER**

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10 Based on the Stipulation of counsel and good cause appearing,

11 IT IS THEREFORE ORDERED that the Evidentiary Hearing currently scheduled on  
12 November 18, 2020 at the hour of 9:00 a.m., be vacated and continued to January 7, 2021 at  
13 the hour of 9:30 a.m., in Courtroom 3D.

14 DATED this 22nd day of October, 2020.

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17 UNITED STATES MAGISTRATE JUDGE